

EXHIBIT 7

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RICHARD XIA, et al.,

Defendants,

and

JULIA YUE and XI VERFENSTEIN, et al.,

Relief Defendants.

Case No.: 21-cv-5350 (PKC)(RER)

STATE OF NEW YORK)
):ss.
COUNTY OF QUEENS)

**AFFIDAVIT OF XI VERFENSTEIN ON BEHALF OF
RACANELLI CONSTRUCTION GROUP**

I, **Xi Verfenstein**, submit this affidavit on behalf of Racanelli Construction Group, Inc. (“Racanelli”), in response to the Court’s December 1, 2023 Order relating to the above-captioned action:

1. Racanelli is not a Defendant in the above-captioned matter.
2. Racanelli has maintained all responsive documents and communications at the following location(s):

The files maintained in offices:

- *112-21 Northern Blvd site trailer*
- *42-31 Union Street: Sub-cellar level office and 9th floor office.*
- *Physical files maintained in offices*
- *Digital files maintained in computers, emails*

Computers:

- *IMac and Macbook laptops in offices*

Mobile devices:

- *Iphones X-12*

Email address:

- *xverfens@racanelliconstructiongroup.com*
- *xverfens@perinigroupinc.com*
- *perinigroupinc@gmail.com*
- *xi.wang@fleetfinancialgroup.com*
- *xi.wang@fleetarchitects.com*

Servers: *N/A*

3. Racanelli has preserved all responsive documents and communications at the locations, files, computers, mobile devices, and email addresses identified in #2 above, where such documents have been maintained. In order to preserve the referenced documents, no documents were deleted.
4. Racanelli conducted searches for responsive documents and communications at the locations and files identified in #2 above.
5. Racanelli conducted searches for responsive documents and communications by using search terms from SEC's documents request questions, date ranges using the same documents request time frames, with no other limitations.
6. All responsive documents are still in the possession of Racanelli.
7. Xi Verfenstein, Racanelli's president, undertook the efforts to search for all responsive documents and communications.

Xi Verfenstein

Xi Verfenstein

Dated: December 22, 2023

Sworn to and subscribed before me
this ____ day of _____, 2023

NOTARY PUBLIC

My Commission Expires: _____